System of Environmental-Economic Accounting—Ecosystem Accounting

Global Consultation on the complete document: Comments Form

Deadline for responses: 30 November 2020
Send responses to: seea@un.org

<table>
<thead>
<tr>
<th>Name:</th>
<th>Tim Liersch</th>
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<tbody>
<tr>
<td>Organization &amp; country:</td>
<td>National Greenhouse Gas Inventory, Australia (Department of Industry, Science, Energy and Resources)</td>
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The comments form has been designed to facilitate the analysis of comments. There are six guiding questions in the form, please respond to the questions in the indicated boxes below. To submit responses please save this document and send it as an attachment to: seea@un.org.

All documents can be found on our website at: https://seea.un.org/content/global-consultation-complete-draft

In case you have any questions or have issues with accessing the documents, please contact us at seea@un.org
General comments

Question 1: Do you have comments on the overall draft of the SEEA Ecosystem Accounting?
N/A

Comments by sets of chapters

Question 2. Do you have comments on Chapters 1-2 of the draft SEEA Ecosystem Accounting?
N/A

Question 3. Do you have comments on Chapters 3-5 of the draft SEEA Ecosystem Accounting?
N/A
Question 4. Do you have comments on Chapters 6-7 of the draft SEEA Ecosystem Accounting?

N/A

Question 5. Do you have comments on Chapters 8-11 of the draft SEEA Ecosystem Accounting?

N/A

Question 6. Do you have comments on Chapters 12-14 of the draft SEEA Ecosystem Accounting?

With regards to the example accounts on Global Climate Regulation Services (carbon stock accounts), the draft text does not look like it has been revisited by the drafters following the revisions of earlier chapters.

For example:

- Table 13.3 continues to consider the geocarbon sources of coal, oil and gas, despite these being ruled out-of-scope of ecosystem accounting (see 3.18, 3.29 & 6.34).
- Table 13.3 also anticipates an ability to estimate opening and closing carbon stocks in the atmosphere, oceans and economy where these are not relevant to the global climate regulation service of the ecosystem. (Flows to and from these are still relevant.)
- Table 13.3 shows the concept of reductions in stock due to “managed contraction”, where it would be more productive to identify “biomass provisioning” segregated by actual removals and production losses retained in the ecosystem (see 6.81).
- Figure 13.1 is citing the to-be-obsolete SEEA EEA 2012, which this document should be superseding and not relying upon.
- References to GHG emission accounts are no longer relevant as they were in the former EEA, due to the shift towards global climate regulation services.
- There is no guidance on how to derive a global climate regulation service quantity from carbon stocks.
Overall, chapter 13.4 feels like it belongs in the Central Framework rather than in the Ecosystem Accounting module. If it is a requirement that these elements be retained due to the needs of the Central Framework, then this should be clearly outlined at the start of the chapter. Otherwise, chapter 13.4 requires significant editing to make it consistent with the rest of the draft SEEA EA.